



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101

July 31, 2006

Reply to  
Attn Of: ETPA-088

Ref: 05-017-AFS

Jeannie Blackmore, IDT Leader  
Ketchikan-Misty Fiords Ranger District  
Tongass National Forest  
648 Mission Street  
Ketchikan, AK 99901

Dear Ms. Blackmore:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement ("EIS" or "DEIS") for the **Traitors Cove Timber Sale** (CEQ No. 20060237) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures we evaluate the document's adequacy in meeting NEPA requirements.

The draft EIS proposed four action alternatives for harvesting timber and one no-action alternative. The action alternatives range from 7.3 to 18.3 million-board feet (MMBF) of timber for harvest in the Traitors Cove area. Alternative 2 is identified as the preferred alternative, harvesting 18.3 MMBF of timber on 973 acres and building 8.89 miles of road. Three existing marine access facilities would be used to transport logs.

EPA has reviewed the draft EIS. Based on our review we have rated the draft EIS "EC-1", Environmental Concerns – Adequate Information, due to the potential for cumulative water quality impacts. The EIS discloses that environmental impacts have occurred to project area watersheds, with 9 of 19 watersheds already exceeding the forest plan threshold of concern (i.e., 20% of the watershed harvested in the last 30 years) (Table 2-2, p. 2-12), and indicating that the present condition of the analysis area is "not functioning properly" (p. 3-17). The preferred alternative would increase watersheds exceeding the threshold of concern to 16 of 19. EPA's comments on the draft EIS recommend that the Forest Service consider selecting an alternative that minimizes these cumulative impacts to these coastal watersheds. A copy of our rating and a summary of our comments will be published in the federal register. An explanation of our rating system is enclosed for your information. We also request that the final EIS provide certain clarifying information regarding the preferred alternative.

### Water Quality and Cumulative Impacts

EPA received a copy of comments on the DEIS from the Alaska Department of Environmental Conservation (ADEC) dated June 27, 2006, expressing their strong concerns regarding cumulative impacts on watersheds from the preferred alternative in combination with past actions. EPA shares these concerns and recommends that the Forest Service consider a modified selected alternative and/or selection of Alternative 3 or 4, which reduces the timber harvest volume and corresponding watershed impact. EPA believes it is appropriate to consider a lower timber volume output alternative to balance timber outputs with water quality (and other) resource concerns. EPA recommends that the final EIS address those issues raised by the ADEC, including:

- Verifying that all MMI4 soils have been removed from the timber harvest volume, and
- Considering a modified alternative that includes uneven-age or two-age management to reduce cumulative watershed impacts, and/or
- Considering selection of Alternative 3 or 4 to reduce the cumulative watershed impacts to those watersheds that are “not properly functioning”.

The DEIS (page 2-2) states that three other timber harvests were put on hold pending additional data collection and analysis. The final EIS should clarify the status of the management direction for three additional timber harvests in the area. If these projects are on hold (as opposed to cancelled), then it would seem appropriate to include these projects as reasonably foreseeable future projects in the cumulative effects analysis, related to the threshold of concern for watershed impacts, timber outputs and employment opportunities.

### Preferred Alternative

The DEIS indicates that a primary objective of the Traitors Cove Timber Sale is to provide employment opportunities, and to meet the district’s annual project distribution for timber outputs of 32 MMBF (NIC I, Appendix A, Table A-4). The justification for relying primarily on clearcutting is to address windthrow potential and disease. In addition to EPA’s concern for water quality impacts associated with percent of watershed disturbance, we also note that impacts to other resources (e.g., heritage resources) could also be reduced by selection of an alternative other than Alternative 2. For example, under Alternative 4 there would be:

- 67 jobs created (less than the maximum 127 in the preferred alternative), but still an 15% increase in employment statewide from the Traitors Cove project (p. 3-144, assuming timber-related jobs are 900 statewide),
- 12 watersheds over 20% harvested in the last 30 years (versus 16 in Alternative 2, the preferred alternative) (Table Aquatics-9),
- 4 units/4 partial units harvested affecting cultural/traditional use areas, and no change to culturally modified trees (versus all 12 units harvested and all culturally modified trees harvested under Alternative 2), (p. 3-53).

If the three smaller timber harvests are still pending, the Forest Service should consider whether those other harvests will allow a smaller volume of timber from the Traitors Cove sale to reduce watershed and other resource impacts, while still meeting overall timber harvest objectives.

In addition, the EIS should also consider whether other planned timber harvests (e.g., the Klam EIS) will contribute to timber outputs and the non-interchangeable component (NIC) I annual project distribution of 32 MMBF for the Ketchikan/Misty Fiords district. The cumulative effects analysis of the Timber Management section of the DEIS (p. 3-150) indicates that the Klam EIS project area is outside the Traitors Cove timber analysis area; the Klam project boundary is depicted on Figure Roadless-1, page 3-79, as just north of the Traitor's Cove project area. However, for purposes of assessing the cumulative impacts and timber outputs (including beneficial effects) EPA recommends that the EIS clarify whether/how the proposed timber outputs from the Klam EIS (and others in the district) would contribute to the NIC target, since both the Klam and Traitors Cove project would also help meet the purpose and need of employment, and cumulatively may be able to offer a more beneficial balance of environmental impacts across the landscape.

We recognize that the proposed action includes important BMPs that reduce water quality impacts (e.g., riparian management areas, felling logs away from streams, removing the most landslide prone units from harvest), and provides analysis of the proposed action relative to forest plan standards and guidelines in a clear manner. We appreciate the clarity of analysis presented in the DEIS. We offer our comments for your consideration in selecting a final action.

#### Marine Access Facilities

The DEIS indicates that all marine access facilities comply with permit requirements. A summary of dive survey results from 2005 indicating percent aerial coverage is included (p. 3-32). For clarity, the final EIS text should state the permit requirements, which require less than 10 cm depth of bark accumulation where bark coverage is continuous (100%) over at least one acre (43,560 sq ft). Since none of the recent dive surveys noted continuous accumulation greater than 9,941 sq ft, the need for providing depth of accumulation was not necessary. EPA supports the implementation of barge transfer for logs as opposed to log rafting to further minimize bark accumulation.

Thank you for the opportunity to provide comments on the draft EIS. If you have any questions, you may contact Peter Contreras at (206) 553-6708.

Sincerely,

/S/

Christine Reichgott, Manager  
NEPA Review Unit

Enclosure